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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$349,940.00 IN U.S.  
CURRENCY,

15 APPROXIMATELY \$144,996.00 IN U.S.  
16 CURRENCY,

17 APPROXIMATELY \$28,046.00 IN U.S.  
CURRENCY,

18 APPROXIMATELY \$9,450.00 IN U.S.  
19 CURRENCY,

20 APPROXIMATELY \$4,381.00 IN U.S.  
CURRENCY,

21 APPROXIMATELY \$2,378.00 IN U.S.  
22 CURRENCY, and

23 APPROXIMATELY \$2,020.00 IN U.S.  
CURRENCY,

24 Defendants.  
25

1:25-MC-00004-KES

STIPULATION AND ORDER EXTENDING  
TIME FOR FILING A COMPLAINT FOR  
FORFEITURE AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING FORFEITURE

26 It is hereby stipulated by and between the United States of America and potential claimant  
27 Alfredo Lopez Nevarez (“claimant”), by and through their respective counsel, as follows:  
28

1           1.       On or about October 31, 2024 claimant Alfredo Lopez Nevarez filed a claim in the  
2 administrative forfeiture proceeding with the Drug Enforcement Administration (“DEA”) with respect to  
3 the Approximately \$349,940.00 in U.S. Currency, Approximately \$144,996.00 in U.S. Currency,  
4 Approximately \$28,046.00 in U.S. Currency, Approximately \$9,450.00 in U.S. Currency, Approximately  
5 \$4,381.00 in U.S. Currency, Approximately \$2,378.00 in U.S. Currency, and Approximately \$2,020.00  
6 in U.S. Currency, which were seized on August 22, 2024 (hereafter collectively the “defendant  
7 currency”).

8           2.       The DEA has sent the written notice of intent to forfeit required by 18 U.S.C. §  
9 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
10 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a  
11 claim to the defendant currency as required by law in the administrative forfeiture proceeding.

12           3.       Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
13 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
14 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
15 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
16 parties. That deadline is January 29, 2025.

17           4.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April  
18 29, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the  
19 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
20 forfeiture.

21           5.       Accordingly, the parties agree that the deadline by which the United States shall be  
22 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
23 alleging that the defendant currency is subject to forfeiture shall be extended to April 29, 2025.

24 Dated: January 23, 2025

MICHELE BECKWITH  
Acting United States Attorney


25  
26 By: /s/ Kevin C. Khasigian  
27 KEVIN C. KHASIGIAN  
28 Assistant U.S. Attorney

Dated: January 23, 2025

/s/ Matt Koohanim  
MATT KOOHANIM  
Attorney for potential claimant  
Alfredo Lopez Nevarez  
(Original signature retained by attorney)

IT IS SO ORDERED.

Dated: January 24, 2025

  
UNITED STATES DISTRICT JUDGE